| PLAINTIFFS' OCTOBER 28, 2008 DESIGNATION OF DEPOSITION TESTIMONY OF BENJAMIN KPEREGBEYI | |
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|---|--|

(Counter-Designations in italicized text)

Deposition October 10 & 12, 2006

| Page/Line Cite | Defendants' Objections and Counter-Designations | Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations | Defendants' Cross- Examination Designations | Plaintiffs' Objections and Counter-Designations | Defendants' Responses to Plaintiffs' Objections and Objections to Counter- Designations |
|----------------|--|---|---|--|---|
| | 4:3, 5:5-10, 8:23-9:6, 11:25-12:14, 13:12-22 | Counter-designations irrelevant and Orejudicial; Plaintiffs' whily designations are from day two of the deposition where deposition where deponents' testimony was given under oath. FRE 401-403. | | | |
| 21:3-14 | | | | | |
| 21:18-19 | | | | | |
| 25:8-10 | | | | | · |
| 36:14-20 | Testimony that concerns January 1999 is irrelevant, confusing and a waste of | Testimony that boats cannot leave Escravos without approval from | | | |

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|----------------|--|--|---|---|---|
| PLAI | PLAINTIFFS' OCTOBER 28, 2008 DESIGNATION OF DEPOSITION TES | DESIGNATION OF DE | POSITION TES | STIMONY OF BENJAMIN KPEREGBEYI | EREGBEYI |
| | | (Testifying By Way of Deposition Or | of Deposition On | nly) | |
| | | (Counter-Designations in italicized text) | ns in italicized to | xt) | |
| i | | Deposition October 10 & 12, 2006 | er 10 & 12, 2006 | | Defendante Domonese |
| Page/Linc Cite | Defendants' Objections and Counter-Designations | Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations | Defendants' Cross- Examination Designations | Plaintiffs' Objections and Counter-Designations | Defendants' Kesponses to Plaintiffs' Objections and Objections to Counter- Designations |
| | time. Whether Seatruck performed transport for CNL does not relate to plaintiffs' | CNL relevant to show control by CNL over GSF. Witness | | | |
| | claims. FRE 401-403. | possesses personal knowledge of degree of | | | |
| | | CNL. Form of | | | |
| | | question appropriate | | | |
| · | (| for witness not affiliated with | | | |
| | | plaintiffs. | | | |
| 66:18-20; | Whether a Seatruck needs | Testimony that boats | | | |
| 66:23-67:1, 21 | approval before leaving Escravos is unrelated to | without approval from | | | |
| | Parabe and will confuse the | CNL relevant to show | | | |
| | jury. FRE 401-403. | GSF. Witness | | | |
| | 66:18-20: Questions are | possesses personal | | | |
| | leading and each question | knowledge of degree of | | | |
| | and testimony in response | control exerted by | | | |
| | onound the purpose of | CIVE: 1 CIM CI | | | |

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Page/Line Cite

Defendants' Responses
to Plaintiffs'
Objections and
Objections to Counter-

Designations

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|-------------|--|---|--|--|----------------------------------|--|--|
| | | | 611. | Defendants' Objections and Counter-Designations | | | NTIFFS' OCTO |
| | | , | | bjections and ssignations | | |)BER 28, 2008 |
| ι ω - | | | question appropriate for witness not affiliated with plaintiffs. | Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations | Deposition October 10 & 12, 2006 | (Testifying By Way of Deposition Only) | PLAINTIFFS' OCTOBER 28, 2008 DESIGNATION OF DEPOSITION TESTIMONY O |
| 3. | | | | Defendants' Cross- Examination Designations | Deposition October 10 & 12, 2006 | of Deposition On | EPOSITION TES |
| | | | | Plaintiffs' Objections and Counter-Designations | Atj | (y) | TIMONY OF BENJAMIN KPEREGBEYI |
| | | | | Defendants to Plaint Objection Objections to Designat | | | PEREGBEYI |

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